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September 19, 2023

**VIA ECF**

**MEMO ENDORSED**

Hon. Sidney H. Stein, USDJ  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Jasmine Toro v. White Elegance, Inc.  
Action No.: 23-cv-7055-SHS  
RR File No.: 013838.00001

Dear Honorable Sidney Stein:

This office was retained on September 18, 2023, to represent defendant White Elegance, Inc. ("Defendant") in the above-mentioned lawsuit. We write to request a forty-five (45) day extension of Defendant's time to respond to the putative class action complaint. Defendant was served on or about August 29, 2023, and the docket states that its response to the complaint is due on or before September 19, 2023. We request that the Court extend Defendant's time to respond through November 3, 2023. This application is made in compliance with Fed.R.Civ.P 6(b)(1)(A) and Your Honor's Individual Rules in 1 (E).

The extension is needed so that we may meaningfully consult with the Defendant concerning the complex allegations raised in the putative class action complaint concerning our client's website and defenses thereto. We also hope to have an opportunity to discuss the claim with Plaintiff's counsel and explore whether an early resolution of the suit is likely prior to incurring the cost of preparation and service of Defendant's response.

This request is being made with the consent of Mars Khaimov, counsel for the plaintiff, and there have been no prior requests for an extension of time to respond to the complaint. The parties further request that the initial pretrial conference, which is currently scheduled for October 26, 2023, be adjourned to a date after November 3, 2023.

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Accordingly, we respectfully request that this Court grant Defendant's application to extend Defendant's time to respond to the Complaint through November 3, 2023, by "So Ordering" this letter in the space provided below. We are, of course, available to discuss the matter at the Court's convenience.

Respectfully submitted,

RIVKIN RADLER LLP

Lawrence S. Han

Lawrence S. Han

**The request to extend the time to respond to the complaint until November 3 is granted. The initial pretrial conference is adjourned to November 29 at 2:30 p.m.**

**Dated: New York, New York  
September 10, 2023**

SO ORDERED

A handwritten signature in blue ink, appearing to read "Sidney H. Stein", is written over a horizontal line.

SIDNEY H. STEIN  
U.S.D.J.